

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOMENICO PRATICO	:	
Plaintiff,	:	
v.	:	
PHILLIP GIANNOPOULOS	:	NO.: 24-cv-____(____)
Defendant.	:	

NOTICE OF REMOVAL

AND NOW, comes the defendant, Phillip Giannopoulos [hereinafter referred to as “Giannopoulos” or “Defendant”) for the purpose of filing a notice of removal of this case to the United States District Court for the Eastern District of Pennsylvania, and respectfully avers as follows:

1. This is a civil action filed and now pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, at Case ID No. January Term, 2024; No.: 01083.
2. The action was commenced by Complaint filed on January 9, 2024. *See* Exhibit “A” - Plaintiffs’ Complaint, Jan. 9, 2024.
3. Service was not effectuated of the Complaint by traditional means, i.e., personal service.
4. On March 7, 2024, Plaintiff filed an Amended Complaint. *See* Exhibit “B” – Amended Complaint, Mar. 7, 2024.
5. On April 17 , 2024, following the filing of a Petition for Alternate Service, the Court, per the Honorable James Crumlish permitted alternate service upon defendant via publication. *See* Exhibit “C” – Order, Apr. 17, 2024.

6. According to plaintiff, plaintiff effectuated service of the Complaint via publication and pursuant to Court Order on April 25, 2024. *See* Exhibit “D” – Affidavit(s) of Service.

7. The averments made herein are true and correct with respect to the date on which the Complaint was filed, served and the date upon which this notice is being filed.

8. This suit is of a civil nature alleging state law common law claims of defamation and fraud and involves a controversy between citizens of different States.

9. According to plaintiff’s State Court Complaint and Amended Complaint, plaintiff “resides at 1907 Mount Vernon Street, Philadelphia, PA 19130.” *See* Exhibit “A” - Complaint, at ¶ 1; *See* Exhibit “B” – Amended Complaint, at ¶ 1.

10. At the time of filing of plaintiff’s Complaint, on January 9, 2024, Defendant was a citizen and resident of the State of New Jersey. *See* Exhibit “E” – Declaration of Defendant, May 23, 2024.

11. In the original complaint, defendant was identified as residing in Philadelphia County. *See* Exhibit “A” – Complaint, at ¶ 2.

12. Contrary to the allegation in plaintiff’s complaint, defendant does not reside at 1241 Saint Vincent Street, Philadelphia, PA. *See* Exhibit “E” – Declaration of Defendant, May 23, 2024.

13. The address of 1241 St. Vincent Street, Philadelphia, Pennsylvania is defendant’s parents’ address. *See* Exhibit “E” – Declaration of Defendant, May 23, 2024, at ¶¶ 4-5.

14. In the Amended Complaint, Defendant is noted as having a Woodside, Queens County, New York address. *See* Exhibit “B” – Amended Complaint, at ¶ 2.

15. Defendant is a citizen and resident of the State of New Jersey where he resides with his wife, at 34 Cranberry Court, Marlton, New Jersey 08053. *See* Exhibit “E” – Declaration of Defendant, May 23, 2024, at ¶ 6, ¶ 9.

16. Defendant does not have any intention to return to the State of New Jersey. *Id.* at ¶ 9, ¶ 18.

17. Defendant has executed a Declaration which indicates that he is a citizen and resident of the State of New Jersey and does not have any intention to return to the Commonwealth of Pennsylvania. *Id.*

18. Defendant has, with the filing of this notice, given written notice to plaintiff’s counsel.

19. Defendant is also filing a copy of the notice of removal and all attachments thereto with the Prothonotary of the Court of Common Pleas of Philadelphia County. *See* Exhibit “F” – State Court Filing.

20. Defendant seeks to remove this matter to the United States District Court for the Eastern District of Pennsylvania based upon diversity of citizenship as the parties are diverse, i.e., citizens of different states and as the amount in controversy in this matter exceeds \$75,000 based on the allegations contained in plaintiffs’ Complaint.

21. In Plaintiff’s State Court Complaint, plaintiff seeks an “award be entered in an amount in excess of \$50,000.00, plus attorney’s fees, costs and interest.” *Id.* at *Ad Damnum Clause*, Counts I & II. *See* Exhibit “A” – Plaintiff’s Complaint; Exhibit “B” – Plaintiff’s Amended Complaint.

22. Importantly, attorney’s fees must also be included in determining the amount in

controversy. 163 F.R.D. 478, 482 (E.D. Pa. 1995). It would not be unreasonable to expect that over the course of an approximate ten-month litigation of this matter attorneys' fees may total \$40,000 or more.¹

23. Given plaintiffs' stated claims for defamation and fraud, the amount in controversy in this case is in excess of the \$75,000 jurisdictional threshold for removal to the federal Court, in accordance with 28 § 1332(a).

24. There is complete diversity among the plaintiff and defendant in this action.

WHEREFORE, Defendant, Phillip Giannopoulos hereby requests removal of this suit to this Honorable Court pursuant to the laws of the United States.

NOTICE

PLEASE TAKE NOTICE, that defendant, Phillip Giannopoulos has filed in this Court a verified Notice for Removal of the State Court action, *Domenico Pratico v. Phillip Giannopoulos*, now pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, Docket No: January Term, 2024; No.: 01083.

PLEASE TAKE FURTHER NOTICE, that a certified copy of the Notice of Removal will be filed with the Prothonotary of the Court of Common Pleas of Philadelphia County, Pennsylvania.

¹ Importantly, while plaintiff seeks attorney's fees on both Counts I & II, plaintiff is alleging purely state law (common law) claims which do not authorize the imposition of attorney's fees absent statutory authority to do so.

PLEASE BE ADVISED, that by virtue of 28 U.S.C. §1446(f), the State action is now removed to this Court. The State Court has no further jurisdiction over this action and you should proceed no further in that Court or under its authority.

LAW OFFICES OF JONATHAN J. SOBEL

BY: /s/ Jonathan J. Sobel
/s/JONATHAN J. SOBEL, ESQUIRE
1500 Walnut Street, Suite 2000
Philadelphia, PA 19103
(215) 735-7535
(215) 735-7539

Attorney for Defendant

DATED: May 23, 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOMENICO PRATICO	:	
Plaintiff,	:	
v.	:	
PHILLIP GIANNOPOULOS	:	NO.: 24-cv-____(____)
Defendant.	:	

**DEFENDANT’S CERTIFICATION OF FILING OF COPY OF
NOTICE OF REMOVAL WITH STATE COURT**

JONATHAN J. SOBEL, ESQUIRE, being duly sworn according to law, deposes and says that he is the attorney for Defendant, Phillip Giannopoulos, and that he did direct the filing with the Prothonotary of Philadelphia County a copy of the Notice of Removal attached hereto, said filing to be made on May 23, 2024, by electronic filing.

LAW OFFICES OF JONATHAN J. SOBEL

BY: /s/ Jonathan J. Sobel
/s/JONATHAN J. SOBEL, ESQUIRE
1500 Walnut Street, Suite 2000
Philadelphia, PA 19103
(215) 735-7535
(215) 735-7539

Attorney for Defendant

Dated: May 23, 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOMENICO PRATICO	:	
Plaintiff,	:	
v.	:	
PHILLIP GIANNOPOULOS	:	NO.: 24-cv-____(____)
Defendant.	:	

CERTIFICATE OF SERVICE

Jonathan J. Sobel, Esquire, after being first duly sworn upon oath, deposes and says that he is of the law firm of Law Offices of Jonathan J. Sobel, attorneys for the defendant, Phillip Giannopoulos and that he did serve this May 23, 2024, the aforementioned Notice to plaintiffs upon the individual named below by electronic mail to:

Deborah R. Stambaugh, Esquire
WISLER PEARLSTINE, LLP
460 Norristown Road, Suite 110
Blue Bell, PA 19422

LAW OFFICES OF JONATHAN J. SOBEL

BY: /s/ Jonathan J. Sobel
/s/JONATHAN J. SOBEL, ESQUIRE
1500 Walnut Street, Suite 2000
Philadelphia, PA 19103
(215) 735-7535
(215) 735-7539

Attorney for Defendant

DATED: May 23, 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOMENICO PRATICO	:	
Plaintiff,	:	
v.	:	
PHILLIP GIANNOPOULOS	:	NO.: 24-cv-____(____)
Defendant.	:	

AFFIDAVIT

I, Jonathan J. Sobel, Esquire, being duly sworn according to law, do hereby depose and state that I am the attorney for Defendant, Phillip Giannopoulos, the Petitioner in the foregoing Notice of Removal, that I have been duly authorized by the Petitioner to execute this Affidavit, that I am familiar with the facts involved in this matter, and that the allegations set forth in the foregoing Notice of Removal are true and correct to the best of my knowledge, information and belief.

LAW OFFICES OF JONATHAN J. SOBEL

BY: /s/ Jonathan J. Sobel
/s/JONATHAN J. SOBEL, ESQUIRE
1500 Walnut Street, Suite 2000
Philadelphia, PA 19103
(215) 735-7535
(215) 735-7539

Attorney for Defendant

DATED: May 23, 2024

EXHIBIT “A”

Court of Common Pleas of Philadelphia County
Trial Division

Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

JANUARY 2024

01083

E-Filing Number: 2401017886

PLAINTIFF'S NAME DOMENICO PRATICO		DEFENDANT'S NAME PHILLIP GIANNOPOULOS	
PLAINTIFF'S ADDRESS 1907 MOUNT VERNON STREET PHILADELPHIA PA 19130		DEFENDANT'S ADDRESS 1241 SAINT VINCENT ST. PHILADELPHIA PA 19111	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input checked="" type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE KT - DISPUTE RE: BUSINESS TORT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PRO PROTHY JAN 09 2024 C. SMITH	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>DOMENICO PRATICO</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY DEBORAH R. STAMBAUGH		ADDRESS 460 NORRISTOWN ROAD SUITE 110 BLUE BELL PA 19422	
PHONE NUMBER (610) 825-8400	FAX NUMBER none entered		
SUPREME COURT IDENTIFICATION NO. 325032		E-MAIL ADDRESS dstambaugh@wispearl.com	
SIGNATURE OF FILING ATTORNEY OR PARTY DEBORAH STAMBAUGH		DATE SUBMITTED Tuesday, January 09, 2024, 12:32 pm	

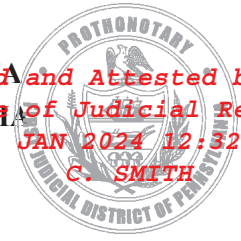
**COMMERCE PROGRAM ADDENDUM
TO CIVIL COVER SHEET**

This case is subject to the Commerce Program because it is not an arbitration matter and it falls within one or more of the following types (check all applicable):

- _____ 1. Actions relating to the internal affairs or governance, dissolution or liquidation, rights or obligations between or among owners (shareholders, partners, members), or liability or indemnity of managers (officers, directors, managers, trustees, or members or partners functioning as managers) of business corporations, partnerships, limited partnerships, limited liability companies or partnerships, professional associations, business trusts, joint ventures or other business enterprises, including but not limited to any actions involving interpretation of the rights or obligations under the organic law (e.g., Pa. Business Corporation Law), articles of incorporation, by-laws or agreements governing such enterprises;
- _____ 2. Disputes between or among two or more business enterprises relating to transactions, business relationships or contracts between or among the business enterprises. Examples of such transactions, relationships and contracts include:
- _____ a. Uniform Commercial Code transactions;
- _____ b. Purchases or sales of business or the assets of businesses;
- _____ c. Sales of goods or services by or to business enterprises;
- _____ d. Non-consumer bank or brokerage accounts, including loan, deposit cash management and investment accounts;
- _____ e. Surety bonds;
- _____ f. Purchases or sales or leases of, or security interests in, commercial, real or personal property; and
- _____ g. Franchisor/franchisee relationships.
- _____ 3. Actions relating to trade secret or non-compete agreements;
- X 4. "Business torts," such as claims of unfair competition, or interference with contractual relations or prospective contractual relations;
- X 5. Actions relating to intellectual property disputes;
- _____ 6. Actions relating to securities, or relating to or arising under the Pennsylvania Securities Act;
- _____ 7. Derivative actions and class actions based on claims otherwise falling within these ten types, such as shareholder class actions, but not including consumer class actions, personal injury class actions, and products liability class actions;
- _____ 8. Actions relating to corporate trust affairs;
- _____ 9. Declaratory judgment actions brought by insurers, and coverage dispute and bad faith claims brought by insureds, where the dispute arises from a business or commercial insurance policy, such as a Comprehensive General Liability policy;
- _____ 10. Third-party indemnification claims against insurance companies where the subject insurance policy is a business or commercial policy and where the underlying dispute would otherwise be subject to the Commerce Program, not including claims where the underlying dispute is principally a personal injury claim.

**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA**

Filed and Attested by the
Office of Judicial Records
09 JAN 2024 12:32 pm
C. SMITH



DOMENICO PRATICO
1907 Mount Vernon Street
Philadelphia, PA 19130

NO. _____

JURY TRIAL DEMANDED

Plaintiff,

v.

PHILLIP GIANNOPOULOS
1241 Saint Vincent St.
Philadelphia, PA 19111

Defendant.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

**Philadelphia Bar Association
Lawyer Referral
and Information Service
1101 Market St., 11th Floor
Philadelphia, Pennsylvania 19107
(215) 238-6333**

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascender una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

**Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
1101 Market St., 11th Piso
Filadelfia, Pennsylvania 19107
(215) 238-6333**

**PHILADELPHIA COUNTY, PENNSYLVANIA
COURT OF COMMON PLEAS**

DOMENICO PRATICO 1907 Mount Vernon Street Philadelphia, PA 19130 Plaintiff, v. PHILLIP GIANNOPOULOS 1241 Saint Vincent St. Philadelphia, PA 19111 Defendant.	NO. _____ JURY TRIAL DEMANDED
---	--

COMPLAINT

Plaintiff, Domenico Praticò (Dr. Praticò) through his undersigned counsel, complains against Phillip Giannopoulos, (Dr. Giannopoulos) as follows:

This matter involves the falsification of research data by Defendant, and intentional representations by Defendant to induce Plaintiff to rely on such data to Plaintiff's detriment.

PARTIES

1. Dr. Praticò is an individual who resides at 1907 Mount Vernon Street, Philadelphia, PA 19130.
2. Upon information and belief, Dr. Giannopoulos is an individual who resides at 1241 Saint Vincent St. Philadelphia, PA 19111 in Philadelphia, Pennsylvania.

VENUE

3. Venue is proper in this Court pursuant to Pennsylvania Rules of Civil Procedure 2179(a)(3) and (4) because the causes of action asserted hereunder arose from transactions and occurrences in Philadelphia County.

FACTS

4. Dr. Praticò is a tenured Professor of Neural Sciences and the Director of the Alzheimer's Center at Temple University.

5. Dr. Praticò's research area is clinical pharmacology with a special focus on the cellular and molecular aspects of cell oxidative biology and a particular interest in small molecules such as bioactive oxidized lipids.

6. Dr. Praticò has authored or participated in authoring over 300 articles, and chapters of several books.

7. Dr. Praticò is the principal researcher in the Praticò Lab which is part of the School of Medicine at Temple University.

8. Students at Temple University use the Praticò Lab to research diseases of the brain, including those that affect memory, language, and the ability to learn.

9. Dr. Praticò served as doctoral advisor to Dr. Giannopoulos during his doctoral program at Temple University. Dr. Giannopoulos received his Ph.D. from Temple University in 2015.

10. Dr. Giannopoulos used Dr. Praticò's lab and certain testing equipment that is housed in the animal facility outside of Dr. Praticò's lab to perform studies that constituted original research ("the Giannopoulos Data"), which Dr. Giannopoulos used for his doctoral dissertation at Temple University.

11. At the time Dr. Giannopoulos received his Ph.D., neither Dr. Praticò nor any other person on his dissertation committee, nor the external reviewer was aware of issues or problems with the Giannopoulos Data. There were three permanent members of the thesis committee.

12. Springer Nature Academic Publishing, Inc. (“Springer Nature”) published two articles (hereinafter “the Articles”) in which Dr. Praticò and Dr. Giannopoulos were named as authors:

- a. Overexpression of 5-lipoxygenase Worsens the Phenotype of a Mouse Model of Tauopathy. *Mol Neurobiol* 2018; 55(7):5926-5936;
- b. Learning Impairments, Memory Deficits, and Neuropathology in Aged Tau Transgenic Mice Are Dependent on Leukotrienes Biosynthesis: Role of the cdk5 Kinase Pathway. *Mol Neurobiol.* 2019 Feb; 56(2):1211-1220

13. Dr. Praticò was the primary author of the Articles.

14. The Articles contains Giannopoulos Data.

15. Prior to submitting the articles to Springer Nature, Dr. Praticò spoke to Dr. Giannopoulos about the publications; in 2015, Dr. Giannopoulos had prepared and formatted text and figures for submission of the article to a different journal, which ended up not publishing the material.

See Exhibits A and B.

16. Dr. Giannopoulos was aware of the publication of the Articles and used the Articles in his public profile on ResearchGate. *See Exhibit C.*

17. In addition, the Articles was listed in Dr. Giannopoulos’ public profile on pubmed. *See Exhibit D.*

18. In March of 2020, after a website name “Pubpeer” posted comments challenging the Giannopoulos Data as set forth in the Articles, Dr. Praticò emailed Dr. Giannopoulos regarding the data.

19. In 2020, after Pubpeer criticized the Giannopoulos Data, Dr. Giannopoulos did not challenge authorship.

20. Upon information and belief, in 2023, Dr. Giannopoulos represented, through his attorney, to the Associate Editor and Publisher at Springer Nature that Dr. Giannopoulos was ‘unaware of the submission and publication’ of the Article, and that he did not consent to the publication of his data.

21. This representation directly conflicts with Dr. Giannopoulos’ ResearchGate and pubmed profiles, in which he indicates he is an author.

22. In 2023, after receiving feedback from peers in the academic community, Dr. Praticò conducted a very careful review of Dr. Giannopoulos’ source data, and of Dr. Giannopoulos’ dissertation, and is now extremely concerned about the integrity of the Giannopoulos Data.

23. To Dr. Praticò’s knowledge, Dr. Giannopoulos never expressed any concern to any person about authorship of the Article until the year 2023. Prior to the year 2023, Dr. Giannopoulos did not ever advise Dr. Praticò that he disagreed with the use of the Giannopoulos Data in the Article, or that he was unaware of its submission or publication.

COUNT I- DEFAMATION

24. All preceding allegations are incorporated herein by reference.

25. Because Dr. Giannopoulos’ attorney is his agent, the defamatory statement by the attorney constitutes a statement by Dr. Giannopoulos.

26. Dr. Giannopoulos’ made a false statement of fact when his attorney represented to Springer Nature Journal that Dr. Giannopoulos was unaware that he was named as an author of the Article and when he claimed that he did not consent to being in the authorship for the Article.

27. Dr. Giannopoulos’ statement to Springer Nature that he did not consent to the publication of the Article is a statement of defamatory character, which blackened Dr. Praticò’s reputation, exposed him to public contempt, and injured his business or profession.

28. Moreover, the statement tends to lower Dr. Praticò's estimation in the community and deter people from associating or dealing with him.

29. The defamatory statement was published when it was made to Springer Nature Journal.

30. The recipient of the defamatory statement understood its defamatory meaning, and understood the statement was intended to be applied to Dr. Praticò.

31. The defamatory statement is not subject to any privilege, or alternatively, to the extent there is a privilege, the privilege was abused.

32. Upon information and belief, when Dr. Giannopoulos, by his counsel, made the false statements, he intended to make them.

33. Dr. Praticò has suffered actual injury as a result of the defamatory statement including an impairment to his reputation and standing in the academic community, personal humiliation, and mental anguish and suffering.

WHEREFORE, Plaintiff respectfully requests (i) judgment be entered in its favor and against Defendant; (ii) an award be entered in an amount in excess of \$50,000, plus attorney's fees, costs and interest; and (iii) the Court grant any further relief deemed appropriate under the circumstances.

COUNT II- FRAUD

34. All preceding allegations are incorporated herein by reference.

35. Dr. Giannopoulos represented to Dr. Praticò on at least two occasions that his data was reliable for scholarly publications, first when he used the data in his dissertation, and second in 2015, when he prepared and formatted text and figures for submission of the article to a journal.

36. Dr. Giannopoulos' misrepresentations were material to the matter at hand and Dr. Praticò continued to rely on the representations when Dr. Praticò submitted the same text and figures to Springer Nature for publication.

37. Dr. Giannopoulos developed the false data knowingly, and with knowledge of his deception.

38. After concerns were raised about the data, in 2023, a third-party expert used specialized software to review the Giannopoulos Data, and found that Dr. Giannopoulos had:

- a. duplicated, altered, and improperly reused data;
- b. appropriated experimental images from other sources not authored by himself, mislabeling them and then presenting them in the thesis as a purported result of his own research activity; and
- c. mislabeled images in an inconsistent way and reusing them to prepare experimental material in support of several research behavior.

39. Dr. Giannopoulos intended for Dr. Praticò to believe in the veracity and accuracy of the Giannopoulos Data both when Dr. Giannopoulos received his Ph.D. and when Dr. Giannopoulos responded to an email encouraging publication of the data.

40. Dr. Praticò relied on the Giannopoulos Data when he submitted Articles containing the Giannopoulos Data to various journals for publication.

41. Dr. Praticò was justified in relying on Dr. Giannopoulos. Neither Dr. Praticò nor anyone else on Dr. Giannopoulos' dissertation committee were aware of problems with the Giannopoulos Data until well after Dr. Giannopoulos received his doctorate and Dr. Praticò submitted the articles containing the Giannopoulos Data for publication.

42. Dr. Praticò has been damaged by this fraudulent conduct. Dr. Giannopoulos' reckless behavior profoundly polluted several manuscripts prepared by Dr. Praticò's lab, and thereby undermining Dr. Praticò's scientific reputation.

43. Dr. Praticò has suffered actual injury as a result of the defamatory statement including an impairment to his reputation and standing in the academic community, personal humiliation, and mental anguish and suffering.

WHEREFORE, Plaintiff respectfully requests (i) judgment be entered in its favor and against Defendant; (ii) an award be entered in an amount in excess of \$50,000, plus attorney's fees, costs and interest; and (iii) the Court grant any further relief deemed appropriate under the circumstances.

WISLER PEARLSTINE, LLP

Dated: January 9, 2024

By: /s/ Deborah R. Stambaugh
Christopher E. Ezold, Esquire
Deborah R. Stambaugh, Esquire
Attorneys for Plaintiff

EXHIBIT “A”

Htau-5LO AAV manuscript

Phillip Giannopoulos <philg82@gmail.com>

Fri 1/9/2015 12:54 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 8 attachments (8 MB)

htau 5LO AAV- figure 7 in vitro 1-9-15.ppt; htau 5LO AAV figure 6 in vitro 1-9-15.ppt; htau-5LO AAV figure 5 inflam 1-9-15.ppt; htau 5LO AAV-figure 4 syp 1-9-15.ppt; htau 5LO AAV figure 3 insoluble tau-kinases 1-9-15.ppt; htau 5LO AAV figure 2-ptau 1-9-15.ppt; htau 5LO AAV behavior figure 1- 1-9-15.ppt; htau 5LO AAV manuscript 1-9-15 nature neuroscience.doc;


Here is the text formatted for nature neuroscience and all the figures (1-7)

Phillip-Electronic Files-1

Phillip Giannopoulos <philg82@gmail.com>

Fri 3/13/2015 12:32 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 3 attachments (20 MB)


htau-5LO AAV.zip; htau zileuton regression.zip; htau-12LO.zip;

Phillip-Electronic Files- 2

Phillip Giannopoulos <philg82@gmail.com>

Fri 3/13/2015 12:32 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 3 attachments (20 MB)


12LO tau.zip; 3xTg-FLAP.zip; P301S-zileuton.zip;

Phillip-Electronic Files-3

Phillip Giannopoulos <philg82@gmail.com>

Fri 3/13/2015 12:32 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 2 attachments (21 MB)

P301S-5LO.zip; htau-zileuton.zip;

Re: greetings et al

Phillip Giannopoulos <philg82@gmail.com>

Thu 4/13/2017 12:49 PM

To: DOMENICO PRATICO <praticod@temple.edu>

I believe they have should at least have my initials on them. If there are any questions let me know. Also, Alana can take a picture on her phone of the box cover and message and I will be able to tell if it's my handwriting.

On Thu, Apr 13, 2017 at 12:23 PM, DOMENICO PRATICO <praticod@temple.edu> wrote:

Phillip,

thanks for your prompt response. We'll look in the freezer, I am sure the boxes will have your name also?

Best

On Thu, Apr 13, 2017 at 12:16 PM, Phillip Giannopoulos <philg82@gmail.com> wrote:

Hey Dr. Pratico,

Great to hear from you. Excited to hear that Alana is prepping to submit. You can leave the Temple affiliation since I performed the work there.

As for the biochemistry files, I will take a look at my external hard drive at home in Philadelphia over the weekend where I have the files saved to see exactly what I have and compare it to what I sent you before I left. I will send you over any necessary files.

In the case I do not have the biochemistry data, I spoke with Alana and told her to check the freezers for the P301S/5LOAAV and P301S/zileuton tissue. I believe it is in the newer of the two freezers but she will double check for me.

Hope things are well with you and we'll be in touch soon.

On Thu, Apr 13, 2017 at 11:51 AM, DOMENICO PRATICO <praticod@temple.edu> wrote:

Hey Phillip,

How are you? I hope this message finds you well!!

Two things:

1. Alana is putting together her data on the P301S 5LO KO mice and since she is using some of your data showing the age/region dependent changes in the 5LO levels you will be in the authorship.

Do you want us to put your current address/work? or just leave the Temple affiliation since the work was performed here?

2. In reviewing the files you gave me with all the unpublished work I noticed that among the different studies, the P301S treated with zileuton and the P301S with aav5LO do not have any biochemistry data.

Can you please tell me where we can find the tissues of these studies? We have a new person in the lab that could complete them.

Looking forward to hearing back form you.

Domenico

--

--

Domenico Pratico, MD
Professor of Pharmacology, Immunology and Microbiology
Center for Translational Medicine
Temple University
3500 North Broad Street
947 MERB
Philadelphia, PA 19140
Tel, 215-707-9380
Fax, 215-707-9890

P301S zileuton and P3015LO

Phillip Giannopoulos <philg82@gmail.com>

Sun 4/16/2017 11:03 PM

To: DOMENICO PRATICO <praticod@temple.edu>

📎 3 attachments (1 MB)

P301S lab meeting 7-21-14 kinases-5LO 12 monthsl.ppt; P301S zileuton figure 7-14-14.ppt; P301S zileuton syp-inflam 7-28-14.ppt;

Hey Dr. Pratico,

Below are all the biochemistry files for the P301 zileuton study. It includes the ptau, insoluble tau, kinases, synaptic and inflammatory markers. For P301S 5LO i could not find any files on the external hard drive. I will continue to look and see if I find anything. i do not recall completing the western blot for that study. I will continue to look and if i come up with any files, i will send them your way. Anything else you need let me know. Hope you had a wonderful Easter!!

Talk to you soon

EXHIBIT “B”

Htau-5LO AAV manuscript

Phillip Giannopoulos <philg82@gmail.com>

Fri 1/9/2015 12:54 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 8 attachments (8 MB)

htau 5LO AAV- figure 7 in vitro 1-9-15.ppt; htau 5LO AAV figure 6 in vitro 1-9-15.ppt; htau-5LO AAV figure 5 inflam 1-9-15.ppt; htau 5LO AAV-figure 4 syp 1-9-15.ppt; htau 5LO AAV figure 3 insoluble tau-kinases 1-9-15.ppt; htau 5LO AAV figure 2-ptau 1-9-15.ppt; htau 5LO AAV behavior figure 1- 1-9-15.ppt; htau 5LO AAV manuscript 1-9-15 nature neuroscience.doc;

Here is the text formatted for nature neuroscience and all the figures (1-7)

EXHIBIT “C”

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Learning Impairments, Memory Deficits, and Neuropathology in Aged Tau Transgenic Mice Are Dependent on Leukotrienes Biosynthesis: Role of the cdk5 Kinase Pathway

February 2019 · [Molecular Neurobiology](#) 56(1):1-10

DOI: [10.1007/s12035-018-1124-7](#)

Authors:



Phillip Fotios Giannopoulos
Temple University



Jian Chiu



Domenico Praticò

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[Citations \(15\)](#)
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Abstract and Figures

Previous studies showed that the leukotrienes pathway is increased in human tauopathy and that its manipulation may modulate the onset and development of the pathological phenotype of tau transgenic mice. However, whether interfering with leukotrienes biosynthesis is beneficial after the behavioral deficits and the neuropathology have fully developed in these mice is not known. To test this hypothesis, aged tau transgenic mice were randomized to receive zileuton, a specific leukotriene biosynthesis inhibitor, or vehicle starting at 12 months of age for 16 weeks and then assessed in their functional and pathological phenotype. Compared with baseline, we observed that untreated tau mice had a worsening of their memory and spatial learning. By contrast, tau mice treated with zileuton had a reversal of these deficits and behaved in an undistinguishable manner from wild-type mice. Leukotriene-inhibited tau mice had an amelioration of synaptic integrity, lower levels of neuroinflammation, and a significant reduction in tau phosphorylation and pathology, which was secondary to an involvement of the cdk5 kinase pathway. Taken together, our findings represent the first demonstration that the leukotriene biosynthesis is functionally involved at the later stages of the tau pathological phenotype and represents an ideal target with viable therapeutic potential for treating human tauopathies.



Chronic administration ... Chronic administration ... Leukotrienes biosynthesis... Leukotriene reduction... Anti-leukotriene therapy...

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Learning Impairments, Memory Deficits, and Neuropathology in Aged Tau Transgenic Mice Are Dependent on Leukotrienes Biosynthesis: Role of the cdk5 Kinase Pathway

Phillip F. Giannopoulos¹ · Jian Chiu¹ · Domenico Praticò¹

Received: 3 April 2018 / Accepted: 11 May 2018 / Published online: 7 June 2018
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Abstract

Previous studies showed that the leukotrienes pathway is increased in human tauopathy and that its manipulation may modulate the onset and development of the pathological phenotype of tau transgenic mice. However, whether interfering with leukotriene biosynthesis is beneficial after the behavioral deficits and the neuropathology have fully developed in these mice is not known. To test this hypothesis, aged tau transgenic mice were randomized to receive zileuton, a specific leukotriene biosynthesis inhibitor, or vehicle starting at 12 months of age for 16 weeks and then assessed in their functional and pathological phenotype. Compared with baseline, we observed that untreated tau mice had a worsening of their memory and spatial learning. By contrast, tau mice treated with zileuton had a reversal of these deficits and behaved in an undistinguishable manner from wild-type mice. Leukotriene-inhibited tau mice had an amelioration of synaptic integrity, lower levels of neuroinflammation, and a significant reduction in tau phosphorylation and pathology, which was secondary to an involvement of the cdk5 kinase pathway. Taken together, our findings represent the first demonstration that the leukotriene biosynthesis is functionally involved at the later stage of the tau pathological phenotype and represents an ideal target with viable therapeutic potential for treating human tauopathies.

Keywords Tauopathy · cdk5 kinase pathway · Five-lipoxygenase · Leukotrienes · Neuroinflammation · Behavior

Introduction

Neurodegenerative diseases represent a large and heterogeneous group of chronic disorders both sporadic and familial, often characterized by the progressive accumulation of signature protein aggregates, which in most cases provide the basis for their neuropathological classification [1]. To this end, the term “tauopathies” is typically used to define some of these diseases whose main feature is the presence of filamentous accumulations of highly phosphorylated tau protein only in neurons or neurons and glial cells [2, 3]. They comprise several different clinical and pathological entities and have been sub-classified into primary and secondary, depending on whether tau neuropathology is considered the major contributing factor to the pathogenesis or simply associated with it [4].

While pathological post-translational modifications of tau have unequivocally been shown to be able to cause neurodegeneration, the precise molecular and cellular mechanism whereby this protein is involved in the pathogenesis of these diseases are still poorly understood. Interestingly, besides the accumulation of highly phosphorylated tau, its filaments, and ultimately the neurofibrillar tangles, consistent evidence has demonstrated that both human tauopathies as well as their animal models are also characterized by intense humoral and cellular neuroinflammatory responses [5, 6].

We recently showed that post-mortem brain tissues from subjects with a clinical and pathological diagnosis of progressive supranuclear palsy, one of the most common forms of tauopathy, have a significant up-regulation of the 5-lipoxygenase (5LO), an enzyme whose metabolic products, the leukotrienes, are potent pro-inflammatory lipid mediators [7, 8]. Further, in relevant mouse models of tauopathy, genetic absence or early pharmacological blockade of 5LO activation resulted in significant improvement of behavioral deficits and delay in the development of tau phosphorylation and pathology [7, 9, 10]. However, all these studies are to be considered as preventative in nature since all of them have used mice at an early stage of their phenotype.

✉ Domenico Praticò
praticod@temple.edu

¹ Alzheimer's Center at Temple, Lewis Katz School of Medicine, Scott Richards North Star Foundation Chair, Alzheimer's Research, Temple University, 947, Medical Education and Research Building, 3500 North Broad Street, Philadelphia, PA 19140, USA

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Citations (15)

References (35)

Case ID: 240101083

... Cdk5 is also associated with early inflammation of AD (Wilkaniec et al., 2018). Leukotriene, an inflammatory factor, may accelerate tau pathological accumulation through the Cdk5 pathway (Giannopoulos et al., 2019). Tau affects the function of subcellular organelles, such as mitochondria and The role of Cdk5 in neurological disorders and the underlying molecular mechanisms. ...

The role of Cdk5 in neurological disorders

Article [Full-text available](#)

Jul 2022

Chuncao Ao · Chenchen Li · Jinlun Chen · Liuwang Zeng

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... More edges in Bayesian Network are at S2 Further investigation is needed for the mixed effects of inflammation, such as considering the confounding effect of inflammation itself and/or medications related to inflammation. For example, Zileuton, a leukotriene biosynthesis inhibitor that is widely used for chronic inflammation (asthma), has shown a significantly reduced level of neuroinflammation and in tau phosphorylation in the tau transgenic mice [65]. ...

Counterfactual analysis of differential comorbidity risk factors in Alzheimer's disease and related dementias

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Mar 2022

Yejin Kim · Kai Zhang · Sean I Savitz · Xiaoqian Jiang

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... Secondly, we analyzed pharmacokinetics of MTK in a transgenic mouse model of AD, because recently it was shown that pharmacological inhibition of leukotriene signaling had beneficial effects in several mouse models of AD [30][31][32][33][34]. The leukotriene receptor antagonist MTK has been proposed as an interesting candidate for drug repurposing in AD patients [13][14][15], due to its potential to modulate neuroinflammation and improve memory in animal models of stroke [35], epilepsy [36,37] and Lewy body dementia [38]. ...

Improved Bioavailability of Montelukast through a Novel Oral Mucoadhesive Film in Humans and Mice

Article [Full-text available](#)

Dec 2020

Johanna Michael · Diana M. Bessa de Sousa · Justin Conway · Ludwig Aigner

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... Consistent with previous studies, our results showed that AMI inhibits the expression of the tau upstream kinase GSK-3 β . In addition, tau protein kinase II (TPKII) formed by a complex containing two subunits of Cyclin-dependent Kinase 5 (CDK5) and p35 can synergistically increase the efficiency of GSK-3 β phosphorylation of tau protein (Xiao et al., 2018; Giannopoulos et al., 2019). Therefore, we need to investigate the expression of tau protein kinase II (TPKII) in the next experiment. ...

AMI, an Indazole Derivative, Improves Parkinson's Disease by Inhibiting Tau Phosphorylation

Article [Full-text available](#)

Nov 2020

Zhang Mao · Zhu Wen-ting · Wang Hai-tao · Wang Wen-ya

[View](#) [Show abstract](#)

... RIPA extracts from human and mouse brain homogenates were used for western blot analyses as previously described [16, 23]. In brief, samples were electrophoresed on 10% Bis-Tris gels or 3-8% Tris-acetate gel (Bio-Rad, Richmond, CA), transferred onto nitrocellulose membranes (Bio-Rad), and then incubated overnight at 4°C with the appropriate primary antibodies; anti-VPS35 [dilution: After three washings with T-TBS (pH 7.4), membranes were incubated with IRDye 800CW-labeled secondary antibodies (LI-COR Bioscience, Lincoln, NE) at room temperature for 1 h. ...

VPS35 regulates tau phosphorylation and neuropathology in tauopathy

Article [Full-text available](#)

Jul 2019

Alana N. Vagnozzi · Jian-Guo Li · Jin Chiu · Domenico Praticò

[View](#) [Show abstract](#)**Leukotriene A4 hydrolase inhibition improves age-related cognitive decline via modulation of synaptic function**[Article](#)

Nov 2023

Julia M. Adams ·  Sanket Rege · Angela T. Liu · Meghan Kerrisk Campbell[View](#) [Show abstract](#)**Microglia in neurodegenerative diseases: mechanism and potential therapeutic targets**[Article](#)[Full-text available](#)

Sep 2023

 Chao Gao · Jingwen Jiang ·  Yuyan Tan · Shengdi Chen[View](#) [Show abstract](#)**Lipids and brain inflammation in APOE4-associated dementia**[Article](#)

Dec 2021

 Marlon Vincent Venancio Duro ·  Brandon Ebright ·  Hussein N Yassine[View](#) [Show abstract](#)**5-Lipoxygenase as an emerging target against age-related brain disorders**[Article](#)May 2021 · [AGEING RES REV](#)

Mengdie Yan · Siran Zhang · Chengtan Li · Lihui Zhang

[View](#) [Show abstract](#)**Leukotrienes in Tumor-Associated Inflammation**[Article](#)[Full-text available](#)

Aug 2020

 Wen Tian ·  Xinguo Jiang ·  Dongeon Kim ·  Stanley G Rockson[View](#) [Show abstract](#)[Show more](#)

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Inhibition of caspase-1 ameliorates tauopathy and rescues cognitive impairment in SAMP8 mice

April 2022 · Metabolic Brain Disease

Meng-Shan Tan · Yi Liu · Hao Hu · [...] · Lan Tan

The inflammasome assembles leading to increased cleavage and activity of caspase-1 and downstream IL-1 β release, which plays a significant role in the pathogenesis of Alzheimer's disease (AD). Previous studies have shown that caspase-1-mediated neuroinflammation occurs early in AD process. However, the detailed role of caspase-1 in aging-related AD-like neuropathology is still unclear so far. In ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

Antileukotriene therapy by reducing tau phosphorylation improves synaptic integrity and cognition of...

March 2018 · Aging Cell

● Phillip Fotios Giannopoulos · Jian Chiu · Domenico Praticò

The 5-lipoxygenase (5LO) is a source of inflammatory leukotrienes and is upregulated in Alzheimer's disease and related tauopathies. However, whether it directly modulates tau phosphorylation and the development of its typical neuropathology in the absence of A β or is a secondary event during the course of the disease pathogenesis remains to be fully elucidated. The goal of this study was to ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

Overexpression of 5-Lipoxygenase Worsens the Phenotype of a Mouse Model of Tauopathy

November 2017 · Molecular Neurobiology

● Phillip Fotios Giannopoulos · Domenico Praticò

Brain accumulation of increasing amount of phosphorylated microtubule associated tau protein is one the major hallmark lesions of Alzheimer's disease (AD) and related tauopathies. Consistent evidence from clinical and animal studies has shown that neuroinflammation characterizes these diseases. The 5-lipoxygenase (5LO) is an enzyme protein whose metabolic products are lipids with potent ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

The direct role of 5-lipoxygenase on tau pathology, synaptic integrity and cognition in a mouse mode...

December 2017 · Translational Psychiatry

Alana N. Vagnozzi · ● Phillip Fotios Giannopoulos · Domenico Praticò

Neurodegenerative tauopathies are characterized by pathological accumulation of highly phosphorylated isoforms of tau protein, which leads to progressive neuronal loss. Neuroinflammation often accompanies tau-driven diseases; however, the direct role of neuroinflammation in tauopathies remains unknown. The 5-lipoxygenase (5LO) is a pro-inflammatory enzyme, which produces several bioactive ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

Retraction Note to: Overexpression of 5-Lipoxygenase Worsens the Phenotype of a Mouse Model of Tauop...

February 2023 · Molecular Neurobiology

Case ID: 240101083

● Phillip Fotios Giannopoulos · Domenico Praticò

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Last Updated: 12 Jun 2023



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EXHIBIT “D”

21 results

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- 10 [Modulation of lipopolysaccharide-induced memory insult, \$\gamma\$ -secretase, and neuroinflammation in triple transgenic mice by 5-lipoxygenase.](#)
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Page 2

- 11 [Learning Impairments, Memory Deficits, and Neuropathology in Aged Tau Transgenic Mice Are Dependent on Leukotrienes Biosynthesis: Role of the cdk5 Kinase Pathway.](#)
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- 17 [5-Lipoxygenase gene transfer worsens memory, amyloid, and tau brain pathologies in a mouse model of Alzheimer disease.](#)
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PMID: 23348377

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VERIFICATION

I, Domenico Pratico, hereby state that I am the Plaintiff in this matter, that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, and that this verification is being made subject to 18 PA. C.S. § 4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read "Domenico Pratico", is written over a light blue rectangular background.

Date: 01/08/2024

By: _____

EXHIBIT “B”

**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA**

**Filed and Attested by the
Office of Judicial Records
07 MAR 2024 03:36 pm
S. RICE**



DOMENICO PRATICO

NO. 240101083

JURY TRIAL DEMANDED

Plaintiff,

v.

PHILLIP GIANNOPOULOS

Defendant.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

**Philadelphia Bar Association
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and Information Service
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AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascender una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

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Filadelfia, Pennsylvania 19107
(215) 238-6333**

WISLER PEARLSTINE LLP

By: Christopher E. Ezold (77369)
Deborah R. Stambaugh (325032)
460 Norristown Rd., Suite 110
Blue Bell, PA 19422
cezold@wispearl.com
dstambaugh@wispearl.com

DOMENICO PRATICO 1907 Mount Vernon Street Philadelphia, PA 19130 Plaintiff, v. PHILLIP GIANNOPOULOS 5021 60th Street Woodside, NY 11377 Defendant.	IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PENNSYLVANIA NO. 240101083 JURY TRIAL DEMANDED
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FIRST AMENDED COMPLAINT

Plaintiff, Domenico Praticò (Dr. Praticò) through his undersigned counsel, complains against Phillip Giannopoulos, (Dr. Giannopoulos) as follows:

This matter involves the falsification of research data by Defendant; intentional representations by Defendant to induce Plaintiff to rely on such data to Plaintiff's detriment; and a false statement by Defendant to a publisher.

PARTIES

1. Dr. Praticò is an individual who resides at 1907 Mount Vernon Street, Philadelphia, PA 19130.
2. Upon information and belief, Dr. Giannopoulos is an individual who resides at 5021 60th Street Woodside, NY 11377.

VENUE

3. Venue is proper in this Court pursuant to Pennsylvania Rules of Civil Procedure 2179(a)(3) and (4) because the causes of action asserted hereunder arose from transactions and occurrences in Philadelphia County.

FACTS

4. Dr. Praticò is a tenured Professor of Neural Sciences and the Director of the Alzheimer's Center at Temple University.

5. Dr. Praticò's research area is clinical pharmacology with a special focus on the cellular and molecular aspects of cell oxidative biology and a particular interest in small molecules such as bioactive oxidized lipids.

6. Dr. Praticò has authored or participated in authoring over 300 papers, and chapters of several books.

7. Dr. Praticò is the principal researcher in the Praticò Lab which is part of the School of Medicine at Temple University.

8. Students at Temple University use the Praticò Lab to research diseases of the brain, including those that affect memory, language, and the ability to learn.

9. Dr. Giannopoulos received his Ph.D. from Temple University in 2015. Dr. Praticò served as doctoral advisor to Dr. Giannopoulos during his doctoral program at Temple University.

10. Dr. Giannopoulos used Dr. Praticò's lab and other testing equipment that is housed in the animal facility and other researcher's labs to perform studies that constituted original research, which Dr. Giannopoulos used for his doctoral dissertation at Temple University.

11. There were three permanent members of the thesis committee, and an external reviewer. At the time Dr. Giannopoulos received his Ph.D., neither Dr. Praticò nor any other person on Dr.

Giannopoulos' dissertation committee, nor the external reviewer observed issues with the Giannopoulos Data.

12. While he worked in Dr. Praticò's lab, Dr. Giannopoulos also generated other research data intended for publication.

13. Dr. Praticò does not micro-manage every step of the research process but trusts his students to exhibit scientific integrity in their research processes.

14. In general, PhD students are very motivated to have their data published because publication helps them develop their reputation in the scientific community and opens pathways for additional post-doctoral studies and other work.

15. Dr. Praticò helped Dr. Giannopoulos get data from his dissertation and other research data published.

16. In part because of his research publications and his written works as reflected on his resume at the time, after Dr. Giannopoulos completed his dissertation at Temple University, he was invited to conduct post-doctoral research at New York University, and worked at New York University for at least a year.

17. Two of the papers Praticò helped Dr. Giannopoulos publish were published by Springer Nature Academic Publishing, Inc. ("Springer Nature") (hereinafter "the Springer Nature Papers"):

- a. Overexpression of 5-lipoxygenase Worsens the Phenotype of a Mouse Model of Tauopathy. *Mol Neurobiol* 2018; 55(7):5926-5936;
- b. Learning Impairments, Memory Deficits, and Neuropathology in Aged Tau Transgenic Mice Are Dependent on Leukotrienes Biosynthesis: Role of the cdk5 Kinase Pathway. *Mol Neurobiol.* 2019 Feb; 56(2):1211-1220

18. The Springer Nature Papers contain data from Dr. Giannopoulos' dissertation.

19. Prior to submitting the papers to Springer Nature, Dr. Praticò spoke to Dr. Giannopoulos about the publications; in 2015, Dr. Giannopoulos had prepared and formatted text and figures for submission of the papers to a different journal, which ended up not publishing the material.

See Exhibits A and B.

20. Dr. Giannopoulos was aware of the publication of the Springer Nature Papers and allowed the papers to appear on his public profile on ResearchGate. *See Exhibit C.*

21. In addition, the Springer Nature Papers were listed in Dr. Giannopoulos' public profile on pubmed. *See Exhibit D.*

22. In March of 2020, after a website name "Pubpeer" posted comments by which other individuals challenged the Giannopoulos Data as set forth in the Springer Nature Papers, Dr. Praticò emailed Dr. Giannopoulos regarding the data.

23. In 2020, after Pubpeer criticized the Giannopoulos Data, Dr. Giannopoulos did not say anything about authorship.

24. Upon information and belief, in 2023, Dr. Giannopoulos represented, through his attorney, to the Associate Editor and Publisher at Springer Nature that Dr. Giannopoulos was 'unaware of the submission and publication' of the Springer Nature Papers, and that he did not consent to the publication of his data.

25. This representation directly conflicts with Dr. Giannopoulos' ResearchGate and pubmed profiles, which indicate he is an author.

26. To Dr. Praticò's knowledge, Dr. Giannopoulos never expressed any concern to any person about authorship of the Springer Nature Papers until the year 2023.

27. Prior to the year 2023, Dr. Giannopoulos did not ever advise Dr. Praticò that he disagreed with the use of the Giannopoulos Data in the Springer Nature Papers, or that he was unaware of submission of the data for publication.

28. After receiving feedback from PubPeer and other persons in the academic community, Dr. Praticò conducted a very careful review of Dr. Giannopoulos' data, and of Dr. Giannopoulos' dissertation, and is now understands the integrity of Dr. Giannopoulos' data is compromised.

29. In addition to the two papers submitted to Springer Nature, Dr. Giannopoulos and Dr. Praticò jointly authored several other papers, some of which relied on materials and data from Dr. Giannopoulos' dissertation, and some of which relied on other data generated by Dr. Giannopoulos, which was not part of his dissertation.

30. Dr. Praticò engaged an outside reviewer to analyze Dr. Giannopoulos data, and the reviewer found that Dr. Giannopoulos' dissertation contained data that had been copied from other published works and manipulated to the point that the integrity of the data is compromised, to include flipping and changing the size of images, and by way of example, re-using images from one experiment to represent results of another experiment.

COUNT I- DEFAMATION

31. All preceding allegations are incorporated herein by reference.

32. Because Dr. Giannopoulos' attorney is his agent, the defamatory statement by the attorney constitutes a statement by Dr. Giannopoulos.

33. Dr. Giannopoulos' made a false statement of fact when his attorney represented to Springer Nature Journal that Dr. Giannopoulos was unaware that he was named as an author of the Springer Nature Papers and when he claimed that he did not consent to being in the authorship for the papers.

34. Dr. Giannopoulos' statement to Springer Nature that he did not consent to the publication of the Springer Nature Papers is a statement of defamatory character, which blackened Dr. Praticò's reputation, exposed him to public contempt, and injured his business or profession.

35. Moreover, the statement tends to lower Dr. Praticò's estimation in the community and deter people from associating or dealing with him.

36. The defamatory statement was published when it was made to Springer Nature Journal.

37. The recipient of the defamatory statement understood its defamatory meaning, and understood the statement was intended to be applied to Dr. Praticò.

38. The defamatory statement is not subject to any privilege, or alternatively, to the extent there is a privilege, the privilege was abused.

39. Upon information and belief, when Dr. Giannopoulos, by his counsel, made the false statements, he intended to make them.

40. Dr. Praticò has suffered actual injury as a result of the defamatory statement including an impairment to his reputation and standing in the academic community, personal humiliation, and mental anguish and suffering.

WHEREFORE, Plaintiff respectfully requests (i) judgment be entered in its favor and against Defendant; (ii) an award be entered in an amount in excess of \$50,000, plus attorney's fees, costs and interest; and (iii) the Court grant any further relief deemed appropriate under the circumstances.

COUNT II- FRAUD

41. All preceding allegations are incorporated herein by reference.

42. Dr. Giannopoulos represented to Dr. Praticò that his data was reliable for scholarly publications.

43. Dr. Giannopoulos' misrepresentations were material to the matter at hand and Dr. Praticò continued to rely on the representations when Dr. Praticò submitted the same text and figures to various journals for publication.

44. Dr. Giannopoulos developed the false data knowingly, and with knowledge of his deception.

45. In 2023, after academic peers had raised concerns about the data, a third-party expert used specialized software to review Dr. Giannopoulos' dissertation to other published works, and found that Dr. Giannopoulos had:

- a. duplicated, altered, and improperly reused data;
- b. appropriated experimental images from other sources not authored by himself, mislabeling them and then presenting them in the thesis as a purported result of his own research activity; and
- c. mislabeled images in an inconsistent way and reusing them to prepare experimental material in support of several research behavior.

46. Dr. Giannopoulos intended for Dr. Praticò to believe in the veracity and accuracy of his data both when Dr. Giannopoulos received his Ph.D. and when Dr. Giannopoulos responded to an email encouraging publication of the data.

47. Dr. Praticò relied on Dr. Giannopoulos' data when he submitted papers containing the dataa to various journals for publication.

48. Dr. Praticò was justified in relying on Dr. Giannopoulos. Neither Dr. Praticò nor anyone else on Dr. Giannopoulos' dissertation committee were aware of problems with the data until well after Dr. Giannopoulos received his PhD.

49. Dr. Praticò has been damaged by this fraudulent conduct. Dr. Giannopoulos' reckless behavior profoundly polluted several manuscripts prepared by Dr. Praticò's lab, and thereby undermining Dr. Praticò's scientific reputation.

50. Three papers co-authored by Dr. Pratico and Dr. Giannopoulos have been retracted by the respective publishers, and Dr. Praticò has had to request the retraction of an additional four published papers on which Dr. Giannopoulos is first author.

51. In addition, Dr. Pratico is reviewing other papers to determine whether to ask publishers to retract or correct additional papers authored by Dr. Giannopoulos.

52. Dr. Praticò has suffered actual injury as a result of Dr. Giannopoulos' fraudulent work, including an impairment to his reputation and standing in the academic community, personal humiliation, and mental anguish and suffering.

WHEREFORE, Plaintiff respectfully requests (i) judgment be entered in its favor and against Defendant; (ii) an award be entered in an amount in excess of \$50,000, plus attorney's fees, costs and interest; and (iii) the Court grant any further relief deemed appropriate under the circumstances.

WISLER PEARLSTINE, LLP

Dated: February __, 2024

By: _____
Christopher E. Ezold, Esquire
Deborah R. Stambaugh, Esquire
Attorneys for Plaintiff

EXHIBIT “A”

Htau-5LO AAV manuscript

Phillip Giannopoulos <philg82@gmail.com>

Fri 1/9/2015 12:54 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 8 attachments (8 MB)

htau 5LO AAV- figure 7 in vitro 1-9-15.ppt; htau 5LO AAV figure 6 in vitro 1-9-15.ppt; htau-5LO AAV figure 5 inflam 1-9-15.ppt; htau 5LO AAV-figure 4 syp 1-9-15.ppt; htau 5LO AAV figure 3 insoluble tau-kinases 1-9-15.ppt; htau 5LO AAV figure 2-ptau 1-9-15.ppt; htau 5LO AAV behavior figure 1- 1-9-15.ppt; htau 5LO AAV manuscript 1-9-15 nature neuroscience.doc;


Here is the text formatted for nature neuroscience and all the figures (1-7)

Phillip-Electronic Files-1

Phillip Giannopoulos <philg82@gmail.com>

Fri 3/13/2015 12:32 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 3 attachments (20 MB)


htau-5LO AAV.zip; htau zileuton regression.zip; htau-12LO.zip;

Phillip-Electronic Files- 2

Phillip Giannopoulos <philg82@gmail.com>

Fri 3/13/2015 12:32 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 3 attachments (20 MB)


12LO tau.zip; 3xTg-FLAP.zip; P301S-zileuton.zip;

Phillip-Electronic Files-3

Phillip Giannopoulos <philg82@gmail.com>

Fri 3/13/2015 12:32 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 2 attachments (21 MB)

P301S-5LO.zip; htau-zileuton.zip;

Re: greetings et al

Phillip Giannopoulos <philg82@gmail.com>

Thu 4/13/2017 12:49 PM

To: DOMENICO PRATICO <praticod@temple.edu>

I believe they have should at least have my initials on them. If there are any questions let me know. Also, Alana can take a picture on her phone of the box cover and message and I will be able to tell if it's my handwriting.

On Thu, Apr 13, 2017 at 12:23 PM, DOMENICO PRATICO <praticod@temple.edu> wrote:

Phillip,

thanks for your prompt response. We'll look in the freezer, I am sure the boxes will have your name also?

Best

On Thu, Apr 13, 2017 at 12:16 PM, Phillip Giannopoulos <philg82@gmail.com> wrote:

Hey Dr. Pratico,

Great to hear from you. Excited to hear that Alana is prepping to submit. You can leave the Temple affiliation since I performed the work there.

As for the biochemistry files, I will take a look at my external hard drive at home in Philadelphia over the weekend where I have the files saved to see exactly what I have and compare it to what I sent you before I left. I will send you over any necessary files.

In the case I do not have the biochemistry data, I spoke with Alana and told her to check the freezers for the P301S/5LOAAV and P301S/zileuton tissue. I believe it is in the newer of the two freezers but she will double check for me.

Hope things are well with you and we'll be in touch soon.

On Thu, Apr 13, 2017 at 11:51 AM, DOMENICO PRATICO <praticod@temple.edu> wrote:

Hey Phillip,

How are you? I hope this message finds you well!!

Two things:

1. Alana is putting together her data on the P301S 5LO KO mice and since she is using some of your data showing the age/region dependent changes in the 5LO levels you will be in the authorship.

Do you want us to put your current address/work? or just leave the Temple affiliation since the work was performed here?

2. In reviewing the files you gave me with all the unpublished work I noticed that among the different studies, the P301S treated with zileuton and the P301S with aav5LO do not have any biochemistry data.

Can you please tell me where we can find the tissues of these studies? We have a new person in the lab that could complete them.

Looking forward to hearing back form you.

Domenico

--

--

Domenico Pratico, MD
Professor of Pharmacology, Immunology and Microbiology
Center for Translational Medicine
Temple University
3500 North Broad Street
947 MERB
Philadelphia, PA 19140
Tel, 215-707-9380
Fax, 215-707-9890

P301S zileuton and P3015LO

Phillip Giannopoulos <philg82@gmail.com>

Sun 4/16/2017 11:03 PM

To: DOMENICO PRATICO <praticod@temple.edu>

📎 3 attachments (1 MB)

P301S lab meeting 7-21-14 kinases-5LO 12 monthsl.ppt; P301S zileuton figure 7-14-14.ppt; P301S zileuton syp-inflam 7-28-14.ppt;

Hey Dr. Pratico,

Below are all the biochemistry files for the P301 zileuton study. It includes the ptau, insoluble tau, kinases, synaptic and inflammatory markers. For P301S 5LO i could not find any files on the external hard drive. I will continue to look and see if I find anything. i do not recall completing the western blot for that study. I will continue to look and if i come up with any files, i will send them your way. Anything else you need let me know. Hope you had a wonderful Easter!!

Talk to you soon

EXHIBIT “B”

Htau-5LO AAV manuscript

Phillip Giannopoulos <philg82@gmail.com>

Fri 1/9/2015 12:54 PM

To: DOMENICO PRATICO <praticod@temple.edu>

 8 attachments (8 MB)

htau 5LO AAV- figure 7 in vitro 1-9-15.ppt; htau 5LO AAV figure 6 in vitro 1-9-15.ppt; htau-5LO AAV figure 5 inflam 1-9-15.ppt; htau 5LO AAV-figure 4 syp 1-9-15.ppt; htau 5LO AAV figure 3 insoluble tau-kinases 1-9-15.ppt; htau 5LO AAV figure 2-ptau 1-9-15.ppt; htau 5LO AAV behavior figure 1- 1-9-15.ppt; htau 5LO AAV manuscript 1-9-15 nature neuroscience.doc;

Here is the text formatted for nature neuroscience and all the figures (1-7)

EXHIBIT “C”

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Learning Impairments, Memory Deficits, and Neuropathology in Aged Tau Transgenic Mice Are Dependent on Leukotrienes Biosynthesis: Role of the cdk5 Kinase Pathway

February 2019 · [Molecular Neurobiology](#) 56(1):1-10

DOI:10.1007/s12035-018-1124-7

Authors:



Phillip Fotios Giannopoulos
Temple University



Jian Chiu



Domenico Praticò

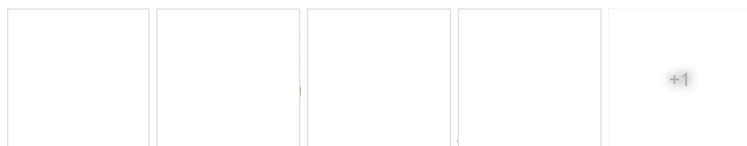
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[References \(35\)](#)
[Figures \(6\)](#)

Abstract and Figures

Previous studies showed that the leukotrienes pathway is increased in human tauopathy and that its manipulation may modulate the onset and development of the pathological phenotype of tau transgenic mice. However, whether interfering with leukotrienes biosynthesis is beneficial after the behavioral deficits and the neuropathology have fully developed in these mice is not known. To test this hypothesis, aged tau transgenic mice were randomized to receive zileuton, a specific leukotriene biosynthesis inhibitor, or vehicle starting at 12 months of age for 16 weeks and then assessed in their functional and pathological phenotype. Compared with baseline, we observed that untreated tau mice had a worsening of their memory and spatial learning. By contrast, tau mice treated with zileuton had a reversal of these deficits and behaved in an undistinguishable manner from wild-type mice. Leukotriene-inhibited tau mice had an amelioration of synaptic integrity, lower levels of neuroinflammation, and a significant reduction in tau phosphorylation and pathology, which was secondary to an involvement of the cdk5 kinase pathway. Taken together, our findings represent the first demonstration that the leukotriene biosynthesis is functionally involved at the later stages of the tau pathological phenotype and represents an ideal target with viable therapeutic potential for treating human tauopathies.



Chronic administration ... Chronic administration ... Leukotrienes biosynthesis ... Leukotriene reduction ... Anti-leukotriene therapy ...

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Learning Impairments, Memory Deficits, and Neuropathology in Aged Tau Transgenic Mice Are Dependent on Leukotrienes Biosynthesis: Role of the cdk5 Kinase Pathway

Phillip F. Giannopoulos¹ · Jian Chiu¹ · Domenico Praticò¹

Received: 3 April 2018 / Accepted: 11 May 2018 / Published online: 7 June 2018
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Abstract

Previous studies showed that the leukotrienes pathway is increased in human tauopathy and that its manipulation may modulate the onset and development of the pathological phenotype of tau transgenic mice. However, whether interfering with leukotriene biosynthesis is beneficial after the behavioral deficits and the neuropathology have fully developed in these mice is not known. To test this hypothesis, aged tau transgenic mice were randomized to receive zileuton, a specific leukotriene biosynthesis inhibitor, or vehicle starting at 12 months of age for 16 weeks and then assessed in their functional and pathological phenotype. Compared with baseline, we observed that untreated tau mice had a worsening of their memory and spatial learning. By contrast, tau mice treated with zileuton had a reversal of these deficits and behaved in an undistinguishable manner from wild-type mice. Leukotriene-inhibited tau mice had an amelioration of synaptic integrity, lower levels of neuroinflammation, and a significant reduction in tau phosphorylation and pathology, which was secondary to an involvement of the cdk5 kinase pathway. Taken together, our findings represent the first demonstration that the leukotriene biosynthesis is functionally involved at the later stage of the tau pathological phenotype and represents an ideal target with viable therapeutic potential for treating human tauopathies.

Keywords Tauopathy · cdk5 kinase pathway · Five-lipoxygenase · Leukotrienes · Neuroinflammation · Behavior

Introduction

Neurodegenerative diseases represent a large and heterogeneous group of chronic disorders both sporadic and familial, often characterized by the progressive accumulation of signature protein aggregates, which in most cases provide the basis for their neuropathological classification [1]. To this end, the term “tauopathies” is typically used to define some of these diseases whose main feature is the presence of filamentous accumulations of highly phosphorylated tau protein only in neurons or neurons and glial cells [2, 3]. They comprise several different clinical and pathological entities and have been sub-classified into primary and secondary, depending on whether tau neuropathology is considered the major contributing factor to the pathogenesis or simply associated with it [4].

While pathological post-translational modifications of tau have unequivocally been shown to be able to cause neurodegeneration, the precise molecular and cellular mechanism whereby this protein is involved in the pathogenesis of these diseases are still poorly understood. Interestingly, besides the accumulation of highly phosphorylated tau, its filaments, and ultimately the neurofibrillar tangles, consistent evidence has demonstrated that both human tauopathies as well as their animal models are also characterized by intense humoral and cellular neuroinflammatory responses [5, 6].

We recently showed that post-mortem brain tissues from subjects with a clinical and pathological diagnosis of progressive supranuclear palsy, one of the most common forms of tauopathy, have a significant up-regulation of the 5-lipoxygenase (5LO), an enzyme whose metabolic products, the leukotrienes, are potent pro-inflammatory lipid mediators [7, 8]. Further, in relevant mouse models of tauopathy, genetic absence or early pharmacological blockade of 5LO activation resulted in significant improvement of behavioral deficits and delay in the development of tau phosphorylation and pathology [7, 9, 10]. However, as these studies are to be considered as preventative in nature since all of them have used mice at an early stage of their phenotype,

✉ Domenico Praticò
praticod@temple.edu

¹ Alzheimer's Center at Temple, Lewis Katz School of Medicine, Scott Richards North Star Foundation Chair, Alzheimer's Research, Temple University, 947, Medical Education and Research Building, 3500 North Broad Street, Philadelphia, PA 19140, USA

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Citations (15)

References (35)

Case ID: 240101083

... Cdk5 is also associated with early inflammation of AD (Wilkaniec et al., 2018). Leukotriene, an inflammatory factor, may accelerate tau pathological accumulation through the Cdk5 pathway (Giannopoulos et al., 2019). Tau affects the function of subcellular organelles, such as mitochondria and The role of Cdk5 in neurological disorders and the underlying molecular mechanisms. ...

The role of Cdk5 in neurological disorders

Article [Full-text available](#)

Jul 2022

Chuncao Ao · Chenchen Li · Jinlun Chen · Liuwang Zeng

[View](#) [Show abstract](#)

... More edges in Bayesian Network are at S2 Further investigation is needed for the mixed effects of inflammation, such as considering the confounding effect of inflammation itself and/or medications related to inflammation. For example, Zileuton, a leukotriene biosynthesis inhibitor that is widely used for chronic inflammation (asthma), has shown a significantly reduced level of neuroinflammation and in tau phosphorylation in the tau transgenic mice [65]. ...

Counterfactual analysis of differential comorbidity risk factors in Alzheimer's disease and related dementias

Article [Full-text available](#)

Mar 2022

Yejin Kim · Kai Zhang · Sean I Savitz · Xiaoqian Jiang

[View](#) [Show abstract](#)

... Secondly, we analyzed pharmacokinetics of MTK in a transgenic mouse model of AD, because recently it was shown that pharmacological inhibition of leukotriene signaling had beneficial effects in several mouse models of AD [30][31][32][33][34]. The leukotriene receptor antagonist MTK has been proposed as an interesting candidate for drug repurposing in AD patients [13][14][15], due to its potential to modulate neuroinflammation and improve memory in animal models of stroke [35], epilepsy [36,37] and Lewy body dementia [38]. ...

Improved Bioavailability of Montelukast through a Novel Oral Mucoadhesive Film in Humans and Mice

Article [Full-text available](#)

Dec 2020

Johanna Michael · Diana M. Bessa de Sousa · Justin Conway · Ludwig Aigner

[View](#) [Show abstract](#)

... Consistent with previous studies, our results showed that AMI inhibits the expression of the tau upstream kinase GSK-3 β . In addition, tau protein kinase II (TPKII) formed by a complex containing two subunits of Cyclin-dependent Kinase 5 (CDK5) and p35 can synergistically increase the efficiency of GSK-3 β phosphorylation of tau protein (Xiao et al., 2018; Giannopoulos et al., 2019). Therefore, we need to investigate the expression of tau protein kinase II (TPKII) in the next experiment. ...

AMI, an Indazole Derivative, Improves Parkinson's Disease by Inhibiting Tau Phosphorylation

Article [Full-text available](#)

Nov 2020

Zhang Mao · Zhu Wen-ting · Wang Hai-tao · Wang Wen-ya

[View](#) [Show abstract](#)

... RIPA extracts from human and mouse brain homogenates were used for western blot analyses as previously described [16, 23]. In brief, samples were electrophoresed on 10% Bis-Tris gels or 3-8% Tris-acetate gel (Bio-Rad, Richmond, CA), transferred onto nitrocellulose membranes (Bio-Rad), and then incubated overnight at 4°C with the appropriate primary antibodies; anti-VPS35 [dilution: After three washings with T-TBS (pH 7.4), membranes were incubated with IRDye 800CW-labeled secondary antibodies (LI-COR Bioscience, Lincoln, NE) at room temperature for 1 h. ...

VPS35 regulates tau phosphorylation and neuropathology in tauopathy

Article [Full-text available](#)

Jul 2019

Alana N. Vagnozzi · Jian-Guo Li · Jin Chiu · Domenico Praticò

[View](#) [Show abstract](#)**Leukotriene A4 hydrolase inhibition improves age-related cognitive decline via modulation of synaptic function**[Article](#)

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Dec 2021

 Marlon Vincent Venancio Duro ·  Brandon Ebright ·  Hussein N Yassine[View](#) [Show abstract](#)**5-Lipoxygenase as an emerging target against age-related brain disorders**[Article](#)May 2021 · [AGEING RES REV](#)

Mengdie Yan · Siran Zhang · Chengtan Li · Lihui Zhang

[View](#) [Show abstract](#)**Leukotrienes in Tumor-Associated Inflammation**[Article](#)[Full-text available](#)

Aug 2020

 Wen Tian ·  Xinguo Jiang ·  Dongeon Kim ·  Stanley G Rockson[View](#) [Show abstract](#)[Show more](#)

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Inhibition of caspase-1 ameliorates tauopathy and rescues cognitive impairment in SAMP8 mice

April 2022 · Metabolic Brain Disease

Meng-Shan Tan · Yi Liu · Hao Hu · [...] · Lan Tan

The inflammasome assembles leading to increased cleavage and activity of caspase-1 and downstream IL-1 β release, which plays a significant role in the pathogenesis of Alzheimer's disease (AD). Previous studies have shown that caspase-1-mediated neuroinflammation occurs early in AD process. However, the detailed role of caspase-1 in aging-related AD-like neuropathology is still unclear so far. In ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

Antileukotriene therapy by reducing tau phosphorylation improves synaptic integrity and cognition of...

March 2018 · Aging Cell

● Phillip Fotios Giannopoulos · Jian Chiu · Domenico Praticò

The 5-lipoxygenase (5LO) is a source of inflammatory leukotrienes and is upregulated in Alzheimer's disease and related tauopathies. However, whether it directly modulates tau phosphorylation and the development of its typical neuropathology in the absence of A β or is a secondary event during the course of the disease pathogenesis remains to be fully elucidated. The goal of this study was to ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

Overexpression of 5-Lipoxygenase Worsens the Phenotype of a Mouse Model of Tauopathy

November 2017 · Molecular Neurobiology

● Phillip Fotios Giannopoulos · Domenico Praticò

Brain accumulation of increasing amount of phosphorylated microtubule associated tau protein is one the major hallmark lesions of Alzheimer's disease (AD) and related tauopathies. Consistent evidence from clinical and animal studies has shown that neuroinflammation characterizes these diseases. The 5-lipoxygenase (5LO) is an enzyme protein whose metabolic products are lipids with potent ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

The direct role of 5-lipoxygenase on tau pathology, synaptic integrity and cognition in a mouse mode...

December 2017 · Translational Psychiatry

Alana N. Vagnozzi · ● Phillip Fotios Giannopoulos · Domenico Praticò

Neurodegenerative tauopathies are characterized by pathological accumulation of highly phosphorylated isoforms of tau protein, which leads to progressive neuronal loss. Neuroinflammation often accompanies tau-driven diseases; however, the direct role of neuroinflammation in tauopathies remains unknown. The 5-lipoxygenase (5LO) is a pro-inflammatory enzyme, which produces several bioactive ... [\[Show full abstract\]](#)

[View full-text](#)Article [Full-text available](#)

Retraction Note to: Overexpression of 5-Lipoxygenase Worsens the Phenotype of a Mouse Model of Tauop...

February 2023 · Molecular Neurobiology

Case ID: 240101083

● Phillip Fotios Giannopoulos · Domenico Praticò

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Last Updated: 12 Jun 2023



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EXHIBIT “D”

21 results

- 1 [The 12/15-lipoxygenase as an emerging therapeutic target for Alzheimer's disease.](#)
 Joshi YB, **Giannopoulos PF**, Praticò D.
 Trends Pharmacol Sci. 2015 Mar;36(3):181-186. doi: 10.1016/j.tips.2015.01.005. Epub 2015 Feb 20.
 PMID: 25708815 [Free PMC article](#). Review.
- 2 [Retraction Note to: Overexpression of 5-Lipoxygenase Worsens the Phenotype of a Mouse Model of Tauopathy.](#)
Giannopoulos PF, Praticò D.
 Mol Neurobiol. 2023 May;60(5):2970-2971. doi: 10.1007/s12035-023-03283-1.
 PMID: 36823264 No abstract available.
- 3 [Novel lipid signaling pathways in Alzheimer's disease pathogenesis.](#)
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VERIFICATION

I, Domenico Praticò, hereby state that I am the Plaintiff in this matter, that the facts set forth in the foregoing Amended Complaint are true and correct to the best of my knowledge, information, and belief, and that this verification is being made subject to 18 PA. C.S. § 4904, relating to unsworn falsification to authorities.

Date: February 5, 2024


By:  _____

EXHIBIT “C”

APR 18 2024

FILED

ROOM 521

17 APR 2024 01:50 pm

Civil Administration

R. JENNINGS

DOMENICO PRATICO

Plaintiff,

v.

PHILLIP GIANNOPOULOS

Defendant.

**IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY,
PENNSYLVANIA**

NO. 240101083

JURY TRIAL DEMANDED

ORDER

And NOW, this 17th day of April, 2024, upon consideration of Plaintiff's Motion for Alternate Service, it is hereby ORDERED that the Motion is GRANTED. Plaintiff is not required to continue efforts to serve Defendant personally and may serve Defendant by publication.

BY THE COURT:

C. M. Smith

, J

DOCKETED

APR 18 2024

R. POSTELL
COMMERCE PROGRAM

240101083-Pratico Vs Giannopoulos



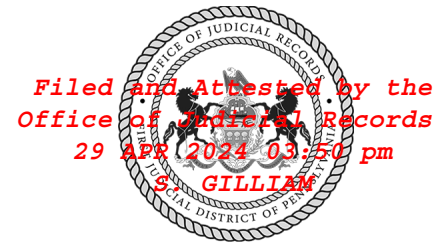
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Case ID: 240101083
Control No.: 24043874

EXHIBIT “D”

WISLER PEARLSTINE LLP

By: Christopher E. Ezold (77369)
 Deborah R. Stambaugh (325032)
 460 Norristown Rd., Suite 110
 Blue Bell, PA 19422
 (610) 825-8400
cezold@wispearl.com
dstambaugh@wispearl.com




*Counsel for Plaintiff, Domenico
 Pratico*

DOMENICO PRATICO Plaintiff, v. PHILLIP GIANNOPOULOS Defendant.	PHILADELPHIA COUNTY, PENNSYLVANIA COURT OF COMMON PLEAS NO. 240101083 PROOF OF SERVICE
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**AFFIDAVIT OF DEBORAH R. STAMBAUGH IN SUPPORT OF
 PLAINTIFF'S PROOF OF SERVICE OF PUBLIC NOTICE**

The undersigned hereby certifies that a true and correct copy of the Plaintiff's Notice to Phillip Giannopoulos was served via Publication upon the Defendant in the Legal Intelligencer on April 25th, 2024.

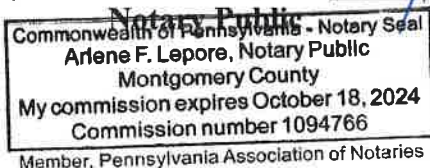

Deborah R. Stambaugh, Esq.
Dated: 4/29/2024

STATE OF PENNSYLVANIA)
)
 COUNTY OF MONTGOMERY)

Sworn and subscribed before me this

29th day of April, 2024.

My Commission Expires: 10/18/24



Philadelphia Court of Common Pleas, No. 240101083

CATEGORY Complaints PA
AD NUMBER 0000704312-01

DOMENICO PRATICO v. PHILLIP GIANNOPOULOS
NOTICE to Phillip Giannopoulos

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association Lawyer Referral and Information Service 1101 Market St., 11th Floor, Philadelphia, Pennsylvania 19107 (215) 238-6333. If you cannot afford to hire a lawyer, this office may be able to provide you with information about agencies that may offer legal services to eligible persons at a reduced fee or no fee. Deborah R. Stambaugh, Esq. 460 Norristown Rd., Suite 110 Blue Bell, PA 19422 (610) 825-8400
4-25-1*

The Philadelphia Inquirer

100 S. INDEPENDENCE MALL W, STE 600, PHILADELPHIA, PA 19106



Affidavit of Publication

On Behalf of:

WISLER, PEARLSTINE, TALONE
460 NORRISTOWN RD
SUITE 110
BLUE BELL, PA 19422

STATE OF PENNSYLVANIA COUNTY OF PHILADELPHIA:

Before the undersigned authority personally appeared the undersigned who, on oath represented a and say: that I am an employee of The Philadelphia Inquirer, LLC, and am authorized to make this affidavit of publication, and being duly sworn, I depose and say:

1. The Philadelphia Inquirer, LLC is the publisher of the Philadelphia Daily News, with its headquarters at 100 S. Independence Mall West, Suite 600, Philadelphia, PA 19106.
2. The Philadelphia Daily News is an edition of The Philadelphia Inquirer. The Philadelphia Daily News is continuously published and distributed Sunday-Friday in the City of Philadelphia, count and state aforesaid.
3. The printed notice or publication attached hereto set forth on attached hereto was published in all regular print editions of the Philadelphia Daily News on

Legal Notices

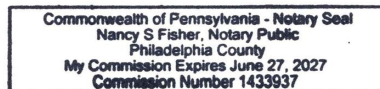
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4. Under oath, I state that the following is true and correct, and that neither I nor The Philadelphia Inquirer, LLC have any interest in the subject matter of the aforesaid notice or advertisement.

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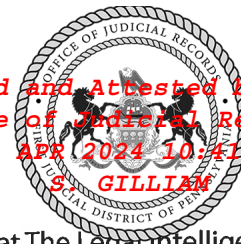
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Philadelphia Court Common Pleas
No. 24010183
DOMENICO PRATICO v. PHILLIP GIANNPOULOS
NOTICE to Phillip Giannopoulos
You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint of for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help. Philadelphia Bar Association Lawyer Referral and Information Service 1101 Market St., 11th Floor Philadelphia, Pennsylvania 19107 (215) 238-6333. If you cannot afford to hire a lawyer, this office may be able to provide you with information about agencies that may offer legal services to eligible persons at a reduced fee or no fee. Deborah R. Stambaugh, Esq. 460 Norristown Rd., Suite 110 Blue Bell, PA 19422 (610) 825-8400

PROOF OF PUBLICATION OF NOTICE IN THE LEGAL INTELLIGENCER

Under Act of May 16, 1929, P.L. 1784, as amended

COMMONWEALTH OF PENNSYLVANIA,
COUNTY OF PHILADELPHIAss.:
}Filed and Attested by the
Office of Judicial Records
30 APR 2024 10:41 am

JENNIFER M. MCCULLOUGH

being duly sworn, deposes and says that The Legal Intelligencer is the designated legal journal for Philadelphia County published at One Penn Center at Suburban Station, 1617 John F. Kennedy Blvd., Philadelphia, Pennsylvania 19103, and was established in said city in 1843, since which date said legal journal has been regularly issued in said county, and that it has been issued daily since September 4, 1933, and that a copy of the printed notice or publication is attached hereto exactly as the same was printed or published in the regular editions and issues of the said legal journal on the following dates, viz.:

APRIL 25, A.D. 2024

Affiant further deposes and says that she is an employee of the publisher of said legal journal and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

Copy of Notice or Publication

Philadelphia Court of Common Pleas, No. 240101083
DOMENICO PRATICO v. PHILLIP GIANNPOULOS
NOTICE to Phillip Giannopoulos

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claimor relief requested by the plaintiff. You may lose money or property or other rights important to you. You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

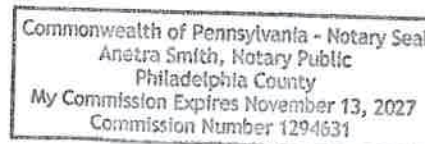
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4-25-1*

Sworn to and subscribed before me this 25th day of
APRIL, 2024

Anetra Smith
Notary Public

Philadelphia, Philadelphia County



OFFICE:
One Penn Center at Suburban Station
Suite 1665
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103

Case ID: 240101083

EXHIBIT “E”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOMENICO PRATICO	:	
Plaintiff,	:	
v.	:	
PHILLIP GIANNOPOULOS	:	NO.: 24-cv-____(____)
Defendant.	:	

DECLARATION OF DEFENDANT, PHILLIP GIANNOPOULOS

Defendant, Phillip Giannopoulos respectfully declares as follows:

1. I make and submit this declaration in Support of my Notice of Motion for Removal.
2. This information is based upon my personal knowledge, the information available to me concerning this matter.
3. I am currently a citizen and resident of the State of New Jersey and I was a citizen and resident of the State of New Jersey when the Complaint was filed on January 9, 2024.
4. While I was attending Temple University pursuing my doctorate, I resided at my parent's home at 1241 St. Vincent Street, Philadelphia, PA.
5. My parents' do not own the home, they rent the property. The property is owned by George Betz and is currently my parent's landlord.
6. I married my spouse, Kerrie Pokusa on May 30, 2021.

7. The company I was working for in Conshohocken, Pennsylvania ceased to exist on December 31, 2022.
8. I began working for Vaniyam Group which is fully remote so I work from Marlton.
9. In or around January, 2023, I moved to 34 Cranberry Court, Marlton, New Jersey 08053, and moved in, permanently with my wife.
10. My wife and I have a seven (7) month old daughter who resides with us in Marlton, New Jersey.
11. My wife owns the property located at 34 Cranberry Court, Marlton, New Jersey 08053.
12. I am not currently registered to vote.
13. Since January, 2023, I have consistently remained in Marlton, New Jersey.
14. My personal property is located in Marlton, New Jersey.
15. I am physically present in the State of New Jersey, not in the Commonwealth of Pennsylvania.
16. I have an account at PNC Bank and utilize the bank in Marlton, New Jersey.
17. My wife and I have attended church services at St. Thomas Church in Cherry Hill, New Jersey.

18.I do not have any intention of returning to Pennsylvania and intend to currently remain in the State of New Jersey and have made New Jersey my home.

19.I declare upon penalty of perjury that the foregoing is true and correct.

Executed on May 23, 2024

Phillip Giannopoulos

PHILLIP GIANNOPOULOS

EXHIBIT “F”

**IN THE COURT OF COMMON PLEAS, PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT – CIVIL TRIAL DIVISION**

DOMENICO PRATICO :
Plaintiff, :
v. :JANUARY TERM, 2024
PHILLIP GIANNOPOULOS :NO.: 01083
Defendant. :

**NOTICE OF REMOVAL TO FEDERAL COURT TO THE
OFFICE OF JUDICIAL RECORDS:**

TO THE OFFICE OF JUDICIAL RECORDS:

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446(b), Defendant, Phillip Giannopoulos by his attorney, Jonathan J. Sobel, Esquire hereby notifies the Prothonotary of this Court that the above-captioned matter was removed to the United States District Court for the Eastern District of Pennsylvania. A true and correct copy of the filed Notice of Removal is attached hereto and identified as Exhibit 1.

LAW OFFICES OF JONATHAN J. SOBEL

BY: /s/ Jonathan J. Sobel
/s/JONATHAN J. SOBEL, ESQUIRE
1500 Walnut Street, Suite 2000
Philadelphia, PA 19103
(215) 735-7535
(215) 735-7539

Attorney for Defendant

Date: May 23, 2024